

**Paul Janzen**

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**From:** Gayle Madrid  
**Sent:** Friday, March 28, 2025 3:11 PM  
**To:** Baumgart, Brenda K.; Johnson, Tom R.; Shaddy-Farnsworth, Sophie  
**Cc:** Paul Janzen; Caroline Janzen; Renee Ripley; Nicole Pierce  
**Subject:** Ellis v. OHSU

Good Afternoon:

In reviewing the discovery responses in the above-entitled matter and the fact that most of the responses were not in final form, I am reserving the discovery responses for the below:

1. Ellis-Response to Request for Production, Response to Request for Admissions, Initial Disclosures and Response to Interrogatories;
2. Brandt- Response to Request for Production, Response to Request for Admissions, Initial Disclosures and Response to Interrogatories;
3. Chavez- Response to Request for Production, Response to Request for Admissions, Initial Disclosures and Response to Interrogatories;
4. Liebe- Response to Request for Production, Response to Request for Admissions, Initial Disclosures and Response to Interrogatories.

Our office has provided links to each plaintiff's responsive documents with the exception of Michelle Liebe. I should have the document link later this evening and will forward it to you promptly. See below Drop Box link which contains all of the Plaintiffs responses.

<https://www.dropbox.com/t/bcFHbMjtmv5OJ2Ue>

*Regards,*

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